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November 26, 2024

**BY ECF**

The Honorable William F. Kuntz, II  
United States District Judge  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE: *United States v. Gorgi Naumovski*, Docket No. 20 Cr. 384 (WFK)**  
Unopposed Request to Modify Conditions of Release to Permit Travel to Las Vegas  
(12/3/2024-12/7/2024) and Canada (12/10/2024-1/8/2025)

Dear Judge Kuntz:

On behalf of our client, Gorgi Naumovski, and with no opposition from the government or Pretrial Services in E.D.N.Y. and S.D. Ill., we respectfully submit this letter requesting that this Honorable Court modify Mr. Naumovski's conditions of pretrial release. Specifically, we request permission for Mr. Naumovski to travel to Las Vegas to attend a work conference from December 3, 2024, through December 7, 2024, and to travel to Canada from December 10, 2024, through January 8, 2025, to visit his family for Christmas and Orthodox Christmas (January 7, 2025). During his stay in Canada, Mr. Naumovski will reside at his parents' home and will remain accessible to Pretrial Services by cell phone. A detailed itinerary will be provided to Mr. Naumovski's Pretrial Services officer before each trip.

Additionally, we request that this Honorable Court order Pretrial Services to return Mr. Naumovski's passport to him 24 hours prior to his planned departure to Canada and require him to return the passport within 24 hours of his return to the United States. Mr. Naumovski successfully completed similar trips in March and July-August 2024 without incident, and his previously submitted extradition waiver from February 2024 remains valid.

We have discussed these requests with Trial Attorney Patrick J. Campbell of the United States Department of Justice and with Pretrial Services, including Mr. Naumovski's supervising pretrial services officer in S.D. Ill. Pretrial Services in E.D.N.Y. and S.D. Ill. have no opposition to any of the requested trips or to the condition requiring the temporary return of Mr. Naumovski's passport. Mr. Campbell, on behalf of the government, has no objection to the work-related trip to Las Vegas and has taken no position on the trip to Canada.

We therefore ask that, by “So Ordering” this letter, the Court modify the travel restriction to permit Mr. Naumovksi’s travel to Las Vegas from December 3, 2024, through December 7, 2024 and to Canada from December 10, 2024, through January 8, 2025 (with the condition that Pretrial Service return Mr. Naumovski’s passport to him 24-hours prior to the planned departure and that Mr. Naumovski will return the passport to Pretrial Services within 24-hours of his return to the United States).

We appreciate Your Honor’s attention and consideration.

Respectfully,

Maksim Nemtsev

CC: Miriam Glaser Dauermann, U.S. Department of Justice (by ECF)  
Patrick. J. Campbell, U.S. Department of Justice (by ECF)